

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|                                      |   |                            |
|--------------------------------------|---|----------------------------|
| <b>RAFAEL GARCIA,</b>                | : |                            |
|                                      | : |                            |
| <i>Plaintiff,</i>                    | : | <b>CIVIL ACTION</b>        |
|                                      | : |                            |
| <b>v.</b>                            | : | <b>No. 24-cv-06316-JFM</b> |
|                                      | : |                            |
|                                      | : |                            |
| <b>CITY OF PHILADELPHIA, et al.,</b> | : |                            |
| <i>Defendants.</i>                   | : |                            |

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**STIPULATION AND PROPOSED ORDER TO EXTEND  
TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

Plaintiff Rafael Garcia and Defendants City of Philadelphia and Bridget Kirn (collectively, "Defendants"), through counsel, hereby stipulate that the time for Defendants to respond to Plaintiff's Complaint is extended until March 10, 2025.

Dated: February 4, 2025

Respectfully submitted,

          /s/ Jill Johnston            
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Jill Johnston  
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*Counsel for Plaintiff Garcia*

/s/ Aleena Y. Sorathia

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*Counsel for Defendant Kirn*

DATED: \_\_\_\_\_ day of \_\_\_\_\_, 2025.

**SO ORDERED:**

\_\_\_\_\_  
THE HONORABLE JOHN F. MURPHY

**CERTIFICATE OF SERVICE**

I hereby certify that on this date, I filed the foregoing Stipulation and Proposed Order to Extend Time to Respond to Plaintiff's Complaint on the Court's ECF Site. The stipulation and proposed order is available for viewing and downloading on the Court's ECF system.

Respectfully submitted,

/s/ Aleena Y. Sorathia

Aleena Y. Sorathia

Katelyn Mays

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*Attorneys for the City of Philadelphia*

Dated: February 4, 2025